



Mr. Howard Bernstein, RPS Manager  
100 Cambridge Street, Suite 1020  
Boston, Massachusetts 02114

July 18, 2006

Re: Proposed Revisions to Renewable Energy Portfolio Standard 225 CMR 14.00

Dear Mr. Bernstein,

I would like to provide my opinion on the RPS Eligibility of Biomass Generation Units. As a Canadian wind energy facility developer, Ventus Energy Inc. has numerous sites in development in the adjacent control areas to the NEPOOL. This represents several thousand MW of wind power which could be imported into New England.

We have been qualified by the DOER to produce Renewable Energy Credits from our West Cape Wind Park. As you can imagine, the costs of building such projects are high because of the distances involved. The only way Ventus can make such a project viable is by participating in the robust market for Renewable Energy Credits in Massachusetts. We feel that if the DOER allows Biomass Generation Units, the market conditions will change materially and pricing will be adversely affected, such that selling RECs will not be a viable option for our facilities.

Mr. Bernstein, we strongly recommend that you reconsider allowing Biomass Generation as part of the Massachusetts RPS so that Ventus and other developers may continue to build wind power projects and provide green power to the State of Massachusetts.

Yours Sincerely,

Zohrab Mawani,  
Manager, Business Development  
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CC: Robert Sydney, General Counsel, Massachusetts Division of Energy Resources